



NRG Delta, LLC
Pittsburg Generating Station
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Pittsburg, CA 94565

January 4, 2017

Mr. Thomas Howard
Executive Director
State Water Resources Board
Division of Water Quality, 15th Floor
1001 I Street
Sacramento, CA 95814

**Re: Once-Through Cooling Policy Implementation Plan Update for Pittsburg Generating Station;
Letter dated November 7, 2016**

Dear Mr. Howard,

NRG Delta, LLC (NRG Delta), owner of the Pittsburg Generating Station (PGS), submits its response to the State Water Resources Control Board's (SWRCB) November 7, 2016 letter in which the SWRCB requested the most current information for PGS pursuant to the Use of Coastal and Estuarine Water for Power Plant Cooling (Policy) and California Water Code §13383. NRG Delta reported the future compliance mechanisms for PGS to the SWRCB in letters submitted on November 7, 2013, April 23, 2015, and February 12, 2016. NRG Delta respectfully responds to the questions posed by the SWRCB in the November 7, 2016 letter, as follows:

1. *Have there been changes to the implementation plan for Pittsburg? Specifically, does NRG still intend to retrofit Pittsburg Unit 7 to a closed-cycle cooling system to provide cooling flow for Pittsburg Units 5 and 6 by December 31, 2017? Does NRG still intend to retire Pittsburg Unit 7 by December 31, 2017? Please describe in detail any other changes to the implementation plan.*

NRG Delta notified both the California Independent System Operator (CAISO) and California Public Utilities Commission (CPUC) of its intention to shut down PGS on December 31, 2016. NRG Delta will not pursue a retrofit of PGS Unit 7 to provide cooling flow to PGS Units 5 and 6 via Unit 7's cooling towers. Once-through cooling (OTC) operation has therefore permanently ceased as of December 31, 2016 at 11:59 pm, in advance of the December 31, 2017 compliance date. However, all three PGS units have been placed on long term outage with the CAISO effective January 1, 2017 in order to preserve transmission system deliverability for a possible future non-OTC replacement project. NRG Delta expects that the units will remain on inactive status for a period of one year, after which NRG Delta will notify the SWRCB of any change in status. In no event does NRG Delta intend to resume OTC operation for power generation.

2. *Has NRG secured the financing and revenue streams needed to execute the retrofit project described in the implementation plan? Please explain.*

As noted in the response above to Question 1, PGS has terminated plans to retrofit Unit 7 to provide cooling flow to Units 5 and 6 via Unit 7's cooling towers.

3. *What actions have been taken to obtain contracts and permits needed to execute the retrofit project described in the implementation plan?*

No contracts or permits are being pursued at this time.

4. *Is there sufficient time to obtain all contracts and permits needed to complete the retrofit project and retire Pittsburg Unit 7 by December 31, 2017?*

NRG Delta does not intend to retrofit the facility.

5. *Please describe the plan to implement interim mitigation measures, including timing and status of required permits.*

PGS has permanently ceased OTC operations effective January 1, 2017, and will therefore no longer be subject to the OTC Policy or associated mitigation measures.

6. *What will be the capacity of the repowered/replaced/retrofitted facility?*

NRG Delta does not intend to repower/replace/retrofit the facility.

7. *Is there any other information that the State Water Board should be made aware?*

There is no other information that the SWRCB should be made aware.

I anticipate the above information has addressed the SWRCB's questions regarding Pittsburg's Implementation Plan. If you have any questions or comments, please do not hesitate to contact me at george.piantka@nrg.com or (760) 710-2156.

Sincerely,
NRG Delta, LLC/Pittsburg Generating Station



George L. Piantka, PE
Sr. Director, Regulatory Environmental Services
NRG Energy, West Region

cc: Lawrence Penn, NRG
Eric Leuze, NRG
Tim Sisk, NRG